

January 25, 2000

Will Stelle Regional Administrator, Pacific Northwest Region National Marine Fisheries Service 7600 Sand Point Way, N.E. Building 1 Seattle, WA 98115

Dear Will:

As you know, we have raised concerns regarding the work of the Cumulative Risk Initiative (CRI) effort of the National Marine Fisheries Service. While we appreciate the effort of these scientists to develop a mechanism to analyze extinction risks and to evaluate potential population growth rates, a number of scientists in the region have raised concerns about the CRI approach and analyses. These concerns need to be addressed if the "federal family" and the region are to make the upcoming decisions on the alternatives outlined in the DEIS and "All H" paper based on credible science and the best available information.

We are particularly concerned about some aspects of the CRI analyses because of obvious and serious policy implications. For example, the selection of one fish in a single year as a quasi-extinction threshold for purposes of analysis has been questioned by many scientists because it appears to be too low and results in optimistic estimates of the likely time to extinction for Snake River spring-summer stocks. These optimistic estimates may lead reasonable people to assume that the region can delay making significant changes to protect the salmon while we conduct further studies. A more conservative and more credible quasi-extinction threshold could significantly alter the projected extinction timeframes and both the public and policymaker understanding of the extinction risks these species face.

We are submitting with this letter seven questions about the CRI analyses and approach that we believe go to the heart of scientific issues critical to the upcoming decision. The questions have been prepared by Dr. Gretchen Oosterhout of Decision Matrix after consulting with a number of other scientists in the region. We request that, in order to ensure that the federal family and the region are in a position to make decisions based on the best available science, the CRI promptly respond to these questions in writing and

reassess any previous conclusions or assumptions as are appropriate in response to these questions. Of course, any responses or changes to the CRI analyses should also be made widely available to the public, consistent with the CRI Team's commitment to transparency and accountability. We also request that these issues be addressed in the public workshops we have asked for in our letter of January 11, 2000, to which we have not yet received a response.

Sincerely,

Jeff Curtis

Trout Unlimited

Rob Masonis 64

American Rivers

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Earthjustice Legal Defense Fund

cc Dr. Peter Karieva

George Frampton, CEQ

Anne Badgely, USFWS

Brigadier General Carl Strock, U.S. Army Corps of Engineers

Don Sampson, CRITFC

Judi Johansen, BPA

Northwest Power Planning Council Members

Chip McConnaha, Northwest Power Planning Council

Dr. David Marmorek

Jim Lichatowich, Chair of the ISAB

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Roy Hemmingway, Oregon Governor's Office

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